



## INSPECTION PROCEDURES

### **Purpose:**

To provide inspectors with standard operating procedures for setting up, planning for, and conducting inspections under the Oregon Department of Agriculture's (ODA) Organic Certification Program.

### **Scope:**

These procedures apply to all organic inspections conducted by ODA staff inspectors, including annual on-site inspections, additional surveillance, and unannounced inspections.

### **Policy Reference:**

[7 CFR 205.403](#)

[NOP 2609](#)

### **Procedures:**

On-site inspections are conducted annually for all new and existing operations, including operations that are undergoing proposed suspension. Additional inspections may be necessary for new sites or production units within a certified facility, or as needed, to verify continued compliance with the National Organic Program (NOP) standards – these may be announced or unannounced, as determined by the ODA or the USDA NOP Administrator. The scope of these additional or surveillance inspections will be determined and communicated to the selected operations by the Certification Program Manager. Annually, a minimum of 5% of ODA's organic customers will receive an unannounced inspection, at cost to the customer. Unannounced inspections may be limited in scope, depth, and may cover only certain aspects of the operation, or unannounced inspections may fulfill the requirements for the annual on-site inspection. Unannounced inspections should not include prior notification to the customer, unless there are extenuating circumstances (i.e. biosecurity issues) in which the operation may receive up to a 4-hour notification. If an operation refuses to allow an inspector access to any part of an operation during normal business hours, including non-organic portions, the operation is in violation of NOP 205.403 and will promptly be issued a notice of non-compliance.

An individual inspector shall not conduct annual on-site inspections for the same operation more than three consecutive years. Additionally, inspectors shall not conduct annual on-site inspections for any customer with whom they have a business or personal relationship that may cause a conflict of interest.



### Procedure Overview

Inspection is assigned to the inspector by the Certification Program Manager or designated lead. The inspector accepts assignment by changing the inspection status to “In Progress.”

The inspector reviews the Initial Review Checklist and schedules an inspection with the applicant.

The inspector conducts the inspection and uploads the Inspection Report, Exit Interview, any additional attachments, and records the time, mileage, and associated fees in the applicant’s record in the database.

The inspector assigns the final review to the Certification Program Manager or designated lead, and closes inspection milestone in the database. The Certification Program Manager assigns final review.

### Scheduling

Inspections should be scheduled with the applicant within one month from the date it was assigned to the inspector in the database. Additionally, the inspector should schedule the inspection for a time when the inspector can observe the operation and its land, facilities, and activities for determining compliance with the NOP regulations. The inspector should confirm with the applicant that an authorized representative of the organization who is knowledgeable about the operation and its organic program is available to be present during the inspection.

### Inspector Responsibilities

- Always be on time and dress appropriately for the operation.
- If inspecting a food handling or processing facility, respect the quality control mechanisms that are in place and follow all policies for visitors, including signing in and washing hands wherever required.

Per Section 205.403(c) of the NOP standards, on-site inspections must verify the following:

- (1) The operation’s compliance or capability to comply with the Act and the regulations in this part;
- (2) That the information, including the organic production or handling system plan, provided in accordance with §205.401, 205.406, and 205.200, accurately reflects the practices used, or to be used, by the applicant for certification or by the certified operation;



- (3) That prohibited substances have not been and are not being applied to the organic product through means which, at the discretion of the certifying agent, may include the collection and testing of soil; water; waste; seeds; plant tissue; and plant, animal, and processed product samples.

### **Verify the System Plan**

During the inspection, be sure to verify that the system plan and updates on file are current and complete. Minor updates shall be completed with the producer while on site – digital copies of the updated documents are encouraged. The inspector's copy of the updated system plan must be submitted as an attachment to the inspector's final report. Additionally, the updated OSP must be uploaded in OACS to the *Company Details* tab and the previous OSP should be deactivated by entering the new inspection date. If the OSP was digitally updated, provide a copy to the applicant. Any changes to the system plan found during the inspection should be noted in the Inspection Report and discussed during the exit interview. Major changes in OSPs should be noted as an issue of concern on the Exit Interview form.

Any input materials that are found to be used on the operation that have not been reviewed and approved in the submitted Organic System Plan should be recorded and all accompanying information collected and uploaded into the database for review, including labels, receipts, and MSDS, if available.

### **Control Points**

Areas of risk are noted in the Inspection Report for those control points that pose the greatest risk of contamination, commingling, or divergence from any applicable standard. In operations that are involved in split, parallel, or any non-organic handling in tandem with organic production, the inspector will review all applicable components of the operation, including non-organic production and handling records and operations to ensure that compliance can be verified. All potential or likely areas of noncompliance will be listed in the Inspection Report as well as on the Exit Interview form (OCP.F.25).

### **Records and Audit**

The inspection includes a systematic review of the OSP and all supporting documentation with the operator. The inspector may review all types of records and documents applicable to the scope of the audit and should note all documentation reviewed in the Inspection Report. The inspector will conduct and document a traceback exercise and mass-balance audit for each operation during the on-site inspection (OCP.F.22a, OCP.F.23a, OCP.F.24a). Inspectors may also choose to see documentation related to other applicable local, state, or federal regulations that govern the operation to determine that the operation is operating within its legal capacity.

### **When & What to Inspect**

Every annual inspection includes a visit to all sites. Sites may be any facility, field, or storage unit that is involved with the production, processing, or handling of any organic product. The inspection



is conducted at a time at which organic or certifiable product may be observed. The inspector verifies that the actual operation or procedures within the operation are concurrent with the OSP. If operations or procedures diverge from the OSP, it is noted in the Inspection Report and on the Exit Interview form, and should be discussed during the exit interview with the customer.

Inspectors may choose to take a sample of product, plant material, soil, or water from the operation if there is concern that contamination of organic product may have occurred. The inspector must document the sample technique used, location, and type of sample taken and include in the Inspection Report all the pertinent information as submitted to the lab. The Exit Interview form serves as a receipt to the customer for the sample taken. Inspectors shall not be charged by the customer for taking a sample of product as part of the inspection and all requests by the customer to this effect should be directed to the Certification Program Manager. Additionally, the inspector should inform the customer that the customer is not responsible for the laboratory evaluation fees of any sample collected in the course of an annual certification inspection.

### **Inspection Report**

Evaluations are conducted of organic producers, processors, and handlers, and reports that address compliance or lack of compliance with the NOP standards are prepared. Inspectors prepare written reports that address the following items:

- Organic production and handling system plans
- Information on soil management
- Input materials used in crop production
- Recordkeeping of materials applied, seeds used and other records, as appropriate
- Audits of sales records
- Audit information about quantity of product produced and sold
- Formulas and labeling of organic processed food products
- Processing aids and their use in processed organic food
- Audits on quantity of product received and quantity of product produced including shrinkage
- Pest management and sanitation programs in food processing and handling facilities
- Risk of use or contamination by genetically-modified organisms (GMOs) and their products or derivatives
- Verification of prior noncompliances and resolution conditions

Inspectors must be intimately familiar with the National Organic Program and ODA Organic Certification Program policies and procedures in order to adequately inspect, evaluate, and report on the inspected organic farms, processors, and handlers.

Inspection reports are expected to be comprehensive and complete and include adequate sentence structure, grammar, and spelling so that the meaning is clear. Completed inspection reports are to



be attached to the customer record in the ODA OACS database within two weeks of the inspection date.

**Exit Interview**

Once the on-site inspection is completed, complete the Exit Interview form, go over all possible concerns with the applicant, and have the company's authorized representative sign the Exit Interview form. All the areas of concern identified in the final report should have, in most cases, been discussed with the producer during the exit interview. Additionally, if a sample was taken, please provide receipt information on the Exit Interview form left with the company's authorized representative.

Once the inspection report is uploaded into the ODA OACS database, a copy will be sent to the producer when the final certification determination is made. Additionally, if any samples were taken from the operation, test results will be forwarded to the applicant, along with the final certification review determination.